IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CANDIDA STOKES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	**Civil Action No.**
THE CITY OF MONTGOMERY,	)	**2:07-cv-686**
ARTHUR BAYLOR, Chief of Police,	)	
BOBBY BRIGHT, Mayor, in	)	
their individual	)	
and official capacities,	)	
	)	
Defendant.	)	

JOINT MOTION FOR EXTENSION OF DEADLINES FOR COMPLETION OF DISCOVERY AND DISPOSITIVE MOTIONS

COME NOW, the parties, by and through their attorneys, and respectfully move this Court to extend the deadline for the parties to complete discovery and the deadline for parties to file dispositive motions in this matter. As grounds for this Motion, the parties state as follows:

1. Under the current Scheduling Order, all discovery must be completed by May 15, 2008. Dispositive motions are due June 26, 2008.

2. The parties in this case have been diligently pursuing discovery. They have exchanged paper discovery and are in the process of responding. Due to scheduling conflicts of various witnesses, the parties have had difficulty scheduling

depositions. Plaintiff has taken one deposition and the parties are in the process of scheduling additional depositions. Additional discovery will need to be completed in order for the parties to appropriately prepare their case.

3. The parties also request that the dispositive motion deadlines also be moved to facilitate obtaining transcripts and submitting the same to the court. .

4. The parties respectfully move this Court to extend the deadline for the completion of discovery and the deadline to submit dispositive motions. The parties request that the deadline for the completion of discovery be continued until July 2, 2008, and that the deadline for the submission of dispositive motions be continued until July 18, 2008.

5. No party will be prejudiced by the granting of this Motion and this extension will not affect any other deadlines.

WHEREFORE, the parties respectfully move this Honorable Court to grant this Motion and extend the deadline for the completion of discovery and the deadline for the submission of dispositive motions as requested herein.

Dated : March 20, 2008.

/s/ Rachel L. McGinley
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